

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION**

MAYTEE ZAGODA a/k/a MAYTEE  
KNEITZ,

Plaintiff,

v.

JTM CAPITAL MANAGEMENT, LLC and  
DCC MANAGEMENT GROUP d/b/a RAS  
and ASSOCIATES,

Defendants.

1:19-cv-03479

**PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT  
AGAINST DCC MANAGEMENT GROUP d/b/a RAS AND ASSOCIATES**

**To the Clerk of the U.S. District Court for the Northern District of Illinois**

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, Plaintiff MAYTEE ZAGODA a/k/a MAYTEE KNEITZ, requests that the Clerk of this Honorable Court enter the default of Defendant DCC MANAGEMENT GROUP d/b/a RAS and ASSOCIATES, for failure to plead or otherwise defend as provided by the Federal Rules of Civil Procedure as appears from the affidavit of Nathan C. Volheim, Esq. attached hereto.

Dated: June 20, 2019

Respectfully submitted,

s/ Nathan C. Volheim

Nathan C. Volheim, Esq. #6302103

*Counsel for Plaintiff*

Sulaiman Law Group, Ltd.

2500 South Highland Avenue, Suite 200

Lombard, Illinois 60148

(630) 568-3056 (phone)

(630) 575-8188 (fax)

nvolheim@sulaimanlaw.com

**CERTIFICATE OF SERVICE**

The undersigned, one of the attorneys for Plaintiff, certifies that on June 20, 2019, he caused a copy of the foregoing PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT AGAINST DCC MANAGEMENT GROUP d/b/a RAS AND ASSOCIATES, to be served on all parties of record via ECF and by U.S. Certified mail, postage prepaid and fax to:

CCC Management Group d/b/a RAS and Associates  
4695 MacArthur Court, 11<sup>th</sup> Floor  
Newport Beach, California 92660  
Fax: (714) 984-0175

CCC Management Group d/b/a RAS and Associates  
c/o Legalzoom.com, Inc., Registered Agent  
101 N. Brand Blvd., 11<sup>th</sup> Floor  
Glendale, California 91203

Respectfully submitted,

s/ Nathan C. Volheim  
Nathan C. Volheim, Esq. #6302103